

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	CRIMINAL NO. 14CR10363-RGS-JCB
)	
v.)	
)	
(1) BARRY J. CADDEN,)	
(2) GLENN A. CHIN,)	
(3) GENE SVIRSKIY,)	
(4) CHRISTOPHER M. LEARY,)	
(5) JOSEPH M. EVANOSKY,)	
(6) SCOTT M. CONNOLLY,)	
(7) SHARON P. CARTER,)	
(8) ALLA V. STEPANETS,)	
(9) GREGORY A. CONIGLIARO,)	
(10) ROBERT A. RONZIO,)	
(11) KATHY S. CHIN,)	
(12) MICHELLE L. THOMAS,)	
(13) CARLA R. CONIGLIARO,)	
(14) DOUGLAS A. CONIGLIARO)	
)	
Defendants.)	

**JOINT MOTION FOR EXTENSION OF TIME TO FILE CONSOLIDATED
MOTION FOR BILL OF PARTICULARS**

Defendants Barry Cadden, Glenn Chin, Gene Svirskiy, Christopher Leary, Joseph Evanosky, Scott Connolly, Sharon Carter, Alla Stepanets and Robert Ronzio (the “Defendants”) hereby move, pursuant to Local Rule 116.3(g), for an extension of time to file a consolidated motion for bill of particulars. In support of this motion, Defendants state as follows:

1. All but one of the Defendants has made a written request to the government for a bill of particulars regarding Counts 1, 2, and/or 3 of the Indictment. The remaining Defendant plans to make a similar written request by August 21, 2015.

2. The government has thus far refused Defendants' requests.
3. Given Local Rule 116.3(h)'s strong preference for consolidated discovery motions in multi-defendant cases, and pursuant to Fed. R. Crim. P. 7(f), Defendants seek permission to file one consolidated motion for bill of particulars.
4. Pursuant to Local Rule 116.3(g), Defendants are required to file any motion for bill of particulars within fourteen days of the government's written response.
5. For certain Defendants, the fourteen-day deadline for their motion is this Friday, August 21, 2015.
6. So that a consolidated motion may be filed, Defendants request an extension of time until fourteen days after the government's last response to the outstanding and anticipated written requests for bills of particular to file their motion.
7. The government does not object to Defendants' request for this extension pursuant to Local Rule 116.3(g).

Dated: August 19, 2015

Respectfully submitted,

BARRY J. CADDEN,
By his attorneys,

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CERTIFICATE OF SERVICE PURSUANT TO L.R. 5.2(b)

I, Dana M. McSherry, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on August 19, 2015.

/s/ Dana M. McSherry

Dana M. McSherry

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